

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KENNETH ALSTON	:	CHAPTER 13
Debtors	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
KENNETH ALSTON	:	
Respondents	:	CASE NO. 5-20-bk-03276

OBJECTION TO DEBTOR'S EXEMPTIONS

AND NOW, this 11th day January, 2021, comes Charles J. DeHart, III,
Standing Chapter 13 Trustee, and objects to the debtor's exemptions for the following reason(s):

1. Trustee objects to debtor's exemption of assets claimed under 11 U.S.C. §522(d)(1).
2. Debtor's exemption of 100% of Fair Market Value without proof of the asset's value deprives unsecured claimants of the asset's value to the estate if it was liquidated under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's
Objection to Debtor's Exemptions.

Respectfully submitted,

/s/Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

CERTIFICATE OF SERVICE

AND NOW, this 21st day January, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Steven Savoia, Esquire
621 Ann Street
P.O. Box 263
Stroudsburg, PA 18360

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee